REMARKS

The above Amendments and these Remarks are in reply to the Office Action mailed February 18, 2005. Claims 1-6 and 10-46 are presented herewith for consideration.

I.   Summary of the Examiner's Rejections

Claims 12 and 13 were considered indefinite by the office because they are functionally equivalent to claims 10 and 11, and encompass the same scope.

Claims 1-6, 10-20, 22-33, 35-42 and 44-46 were rejected under 35 USC 102(e) as being anticipated by U.S. Patent No. 6,163,779 to Mantha et al. (Mantha).

Claims 21, 34, and 43 are rejected under 35 USC 103(a) as being unptentable over Mantha as applied to claims 2, 22, and 35, and further in view of U.S. Patent No. 6,581,065 to Rodkin et al. (Rodkin).

II.   Rejection of Claims 7-9, 12-14 Under 35 USC 112, Second Paragraph

Claims 12 and 13 were rejected under Section 112, Second Paragraph, as being functionally equivalent to Claims 10 and 11. However, Claim 10 requires that the step of inserting a reference to the network device in the modified link be included as part of step (d) of Claim 2. By contrast, in Claim 12, while the inclusion of a reference to the network device in the modified link may occur in step (d) of Claim 2, it is not so limited. Thus, it is respectfully submitted that Claim 12 is not functionally equivalent to Claim 10. Claim 13 is also respectfully submitted to be definite by virtue of its dependence on Claim 12, which as indicated above, is not functionally equivalent to Claim 10.

The Examiner has indicated in the "Response to Arguments" section that:

Given the structure or the unmodified link, and the applicant's admission that the link may be wrapped only once (P. 12, line 7-12), the examiner concludes that the modification must occur between identifying the link (step c) and

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delivering the modified link (step e), where step d clearly delineates the modifying process. Thus claims 12 and 13 are redundant and hence lead to indefiniteness.

Applicant respectfully responds first by disagreeing that applicant's disclosure at page 12, lines 7-12 is an admission that the link may be wrapped only once.

Next, applicant respectfully submits that Claims 12 and 10, by their literal language, have a different scope. Claim 2 has the following steps:

> (c)   identifying a link within said first electronic content;

> (d)   wrapping said link to obtain a wrapped version of said link that identifies a resolvable address on the network; and

> (e)   delivering a modified version of said first electronic content, wherein said modified version of said first electronic content includes said wrapped version of said link.

The Examiner has said that the limitation of Claim 12, that said modified link include a reference to said network device, must occur between the steps (c) and (e) of Claim 2. Regardless of whether this is necessarily true, it is possible that the limitation of Claim 12 occur between steps (c) and (e), *but still not be part of step (d)*. In fact, there are a wide variety of scenarios, whether known to the Examiner or otherwise, where the limitation of Claim 12 may not be part of step (d), but still occur between steps (c) and (e) of Claim 2.

Thus, it is respectfully submitted that Claim 12 and Claim 10 are not of the same scope and are definite.

As Claims 11 and 13 depend from Claims 10 and 12 respectively, and as Claims 10 and 12 have different scopes as discussed above, it is further respectfully submitted that Claims 11 and 13 are similarly different in scope and are definite.

Based on the above, it is respectfully requested that the rejection of Claims 12 and 13 as being indefinite be withdrawn.

III. Rejection of Claims 1-20, 22-33, and 35-42 Under 35 USC 102(e)

Claims 1-20, 22-33, and 35-42 were rejected under 35 USC 102(e) as being anticipated by Mantha. Applicant respectfully traverses the rejection as follows.

Mantha relates to a system for copying an html document and embedded objects/links from a network server onto a hard drive of a client device. As stated in Mantha:

It is a primary goal of the present invention to provide a method for copying or "saving" a Web page onto a local storage to enable a user to browse the page at a subsequent time. (Col. 1, lines 60-65).

The browsing at a subsequent time refers to pulling the copy of the saved web page from the client's local hard drive. Mantha is clear that, once the page is copied, the page is accessed from the local hard drive, not from the network server. Subsequent browsing of the page occurs on the client side, from the copy stored on the client side hard drive, thus accomplishing the stated purpose of Mantha which is speedier access to web pages. Mantha states:

when the user later brings up the copied page, the page comes up immediately as the normal client pull operation to the server is avoided. (Col. 2, lines 19-21).

And again later on:

At step 50, the copied Web page 49 is retrieved from the local hard drive and displayed on the browser. This operation is performed without pulling the Web page from the computer network. (Col. 9, lines 33-37).

At the end of this operation, there is a new HTML page with links for images pointing to files on the local hard drive. When the user desires to retrieve the copied page, a link to the pointer is activated. The saved page comes up essentially instantaneously because all the images are on the hard drive and no network access is required. (Col. 12, lines 30-35).

Mantha discloses that content stored on the local hard drive may include fully qualified URLs, i.e., URLs for network locations that have been resolved into a form that is accessible from a non-networked location. However, the resolved URL is stored on the local hard drive. Thus, in Mantha, the request for information is made solely on the local hard

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drive, and to the extent possible, serviced completely from stored content on the local hard drive, thus accomplishing the speed objective of Mantha.

By contrast, the present invention recites making a request from a non-network device for content stored on a network. A network server resolves any non-resolvable hyperlinks, and the network server delivers the modified content to the non-network device. These features are expressly recited in the claims. For example, Claim 1 recites the steps of:

> receiving at a server on a local network, a request for delivery to a destination client that is not on the local network, of electronic content that is associated with the local network, wherein the electronic content includes one or more links that are only resolvable within said local network;
>
> retrieving the electronic content from within the local network;
>
> generating updated content by modifying the one or more links associated with the electronic content to include information identifying said server; and
>
> delivering said updated content to said destination client.

The feature of requesting information from a non-network device for content stored on a network server, the network server resolving any non-resolvable hyperlinks, and the network server delivering the modified content to the non-network device is nowhere disclosed, taught or suggested in Mantha. In order to support a rejection under §102, each and every limitation found in the claims must be disclosed in a prior art reference. *Rockwell Intern. Corp. v. U.S.*, 147 F.3d 1358, 1363 (Fed. Cir. 1998); *Electro Med. Sys. S.A. v. Cooper Life Sciences*, 34 F.3d 1048, 1052 (Fed. Cir. 1994). Omission of any claimed element, no matter how insubstantial, is grounds for traversing a rejection based on §102. *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542 (Fed. Cir. 1983).

Based on the above, it is respectfully requested that the rejection of the above-recited claims on §102 grounds be withdrawn.

Moreover, with respect to Claim 46, that claim recites in part:

> (a)   receiving a request for electronic content from said network;
>
> (b)   retrieving said first electronic content from said network;
>
> (c)   identifying a first link within said first electronic content;

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(d)   determining whether said first link can be resolved outside of said network;

(e)   wrapping said first link to obtain a wrapped version of said first link if said step (d) determines said first link cannot be resolved outside of said network;

(f)   retrieving a second electronic content pointed to by said first link;

(g)   identifying a second link within the second electronic content;

(h)   determining whether said second link can be resolved outside of said network;

(i)   wrapping said second link to obtain a wrapped version of said second link if said step (h) determines said second link cannot be resolved outside of said network; and

(j)   delivering a modified version of said first electronic content if at least one of said first and second links are wrapped in said steps (e) and (i), wherein said modified version of said first electronic content includes at least one said wrapped version of said first and second links.

Mantha has no teaching or suggestion of resolving a URL within a resolved URL. Mantha stores a resolved URL on a local hard drive and nothing more.

IV.   Rejection of Claims 21, 34, and 43 Under 35 USC 103(a)

Claims 21, 34, and 43 are rejected under 35 USC 103(a) as being unptentable over Mantha, and further in view of Rodkin. However, each of Claims 21, 34 and 43 depend on Claims 2, 22, and 35. As set forth above, Claims 2, 22 and 35 recite features nowhere taught or suggested in Mantha. Namely, Claims 2, 22 and 35 each recite the features of requesting content from a network server, the network server resolving any non-resolvable hyperlinks, and the network server delivering the modified content is nowhere disclosed, taught or suggested in Mantha. Rodkin adds nothing to the teaching of Mantha in this regard. Thus, it is respectfully submitted that Claims 21, 34 and 43 are each patentable over the cited references, taken alone or in combination with each other. It is therefore respectfully requested that the rejection of Claims 21, 34, and 43 on Section 103 grounds be withdrawn.

Based on the above amendments and remarks, reconsideration of Claims 1-6, and 10-43, and consideration of Claims 44-46, is respectfully requested.
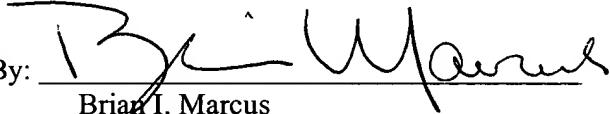
The Examiner's prompt attention to this matter is greatly appreciated. Should further questions remain, the Examiner is invited to contact the undersigned attorney by telephone.

Enclosed is a PETITION FOR EXTENSION OF TIME UNDER 37 C.F.R. § 1.136 for extending the time to respond up to and including today, August 18, 2005.

The Commissioner is authorized to change any underpayment or credit any overpayment to Deposit Account No. 501826 for any matter in connection with this document.

Respectfully submitted,

Date: August 18, 2005   By: _____
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